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2 3	DAVID R. CALLAWAY (CABN 121782) Chief, Criminal Division	
4 5 6 7 8	BENJAMIN KINGSLEY (NYBN 4758389) Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-6937 FAX: (415) 436-7234 Benjamin.Kingsley@usdoj.gov Attorneys for the United States	
9	UNITED STATES DISTRICT COURT	
0	NORTHERN DISTRICT OF CALIFORNIA	
1	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA,	CASE NO: CR 15-518 RS
13	Plaintiff,	STIPULATION AND [PROPOSED] PROTECTIVE ORDER REGARDING DISCOVERY OF
14	v.)	SENSITIVE INFORMATION
15	ROBERT JACOBSEN,	
16	Defendant.	
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18	Defendant is charged in a twenty-two count indictment with wire fraud and with engaging in	
19	financial transactions involving the proceeds of specified unlawful activity. Pursuant to defendant's	
20	request for discovery, the United States will produce to defendant media compiled as part of this	
21	investigation. This media includes personal identifying information of individuals other than the	
- 1	1	

1. All materials produced by the United States in this case and containing personal identifying information (including but not limited to social security numbers, home addresses, bank account numbers, credit card numbers, or other financial account numbers) belonging to individuals other than defendant shall be labeled "protected material."

defendant. Because some of this material is relevant to the government's case against defendant and

because redacting it would be impractical, the parties stipulate, and the Court orders, that disclosure of

STIPULATION AND [PROPOSED] PROTECTIVE ORDER

these materials shall be subject to the following restrictions:

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- 2. Except when being actively examined for the purpose of the preparation of the defense of defendant, any protected material (including copies of print-outs of digital media) produced by the United States to defense counsel, Doron Weinberg, shall be maintained in an office accessible only to Mr. Weinberg, employees of Mr. Weinberg, or escorted guests. Mr. Weinberg shall not permit any person access of any kind to the protected material except as set forth below.
- 3. The following individuals may examine protected material and copies of print-outs thereof for the sole purpose of preparing the defense or sentencing, of the defendant and for no other purpose:
 - Counsel for the defendant, Doron Weinberg; a)
 - Paralegals, assistants, and investigators employed by Mr. Weinberg as part of this b) case;
 - c) The defendant Robert Jacobsen, but only in the presence of his attorney;
 - d) Any outside expert retained by the defendant to analyze the media in this matter; and
 - US Probation. e)

If defense counsel determines that additional attorneys, experts, paralegals or investigators are needed to review the material, he must obtain a further order of the Court before allowing any other individual to review the material.

- 4. A copy of this Order shall be maintained with the protected material and copies of printouts thereof at all times.
- 5. No other person may be allowed to examine the material without further court order. Examination of the protected material and copies of print-outs thereof shall be done in a secure environment that will not expose the materials to other individuals not listed above.
- 6. Files contained within the protected material may be duplicated to the extent necessary to prepare the defense of this matter but if duplicated, are subject to the same restraints as the material itself.
- 7. Any pleadings that include the above-described materials or their contents shall be filed under seal or with appropriate redactions removing personal identifying information. STIPULATION AND [PROPOSED] PROTECTIVE ORDER

1	8. Within 30 court days of the judgment and sentencing hearing in this matter, all material	
2	provided to defense counsel pursuant to this Order, and all other authorized copies, if any, shall be	
3	returned to the United States. The United States shall destroy them. If an appeal is noticed and Mr.	
4	Weinberg continues to represent the defendant on appeal, he may continue to retain possession of the	
5	materials according to the terms of this Order until the conclusion of the matter in the Court of Appeals.	
6	The government will maintain a copy of all Protected Material in compliance with its normal document	
7	retention policies.	
8	IT IS SO STIPULATED.	
9 10	DATED: December 29, 2015 S S BENJAMIN KINGSLEY Assistant United States Attorney	
111213	DATED: December 29, 2015 S DORON WEINBERG Counsel for Defendant Robert Jacobsen	
14 15	[PROPOSED] ORDER	
161718	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
19 20	DATED: 1/4/2016 HON. RICHARD SEEBORG UNITED STATES DISTRICT JUDGE	
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	STIPULATION AND [PROPOSED] PROTECTIVE ORDER	